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*Attorneys for Plaintiff*  
*ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG; ILIOS  
CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS

Case No. 2:24-cv-8280-WLH-E

**PLAINTIFF'S NOTICE OF  
WITHDRAWAL OF REQUEST FOR  
PRELIMINARY INJUNCTION  
WITHOUT PREJUDICE TO  
REFILING AFTER ADDITIONAL  
DISCOVERY**

VASCONCELOS,  
Defendants.

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT, pursuant to Local Rule 7-16, Plaintiff Electric  
3 Solidus, Inc. d/b/a Swan Bitcoin (“Swan”) hereby withdraws its request for preliminary  
4 injunction without prejudice, which request is currently scheduled to be heard on  
5 November 8, 2024 at 11:30 a.m.

6 On October 16, 2024, the Court counseled that, “if Plaintiff believes discovery is  
7 necessary for a preliminary injunction hearing, Plaintiff can stipulate to continue the  
8 preliminary injunction hearing and seek expedited discovery through a regular noticed  
9 motion.” (ECF No. 54). Accordingly, Swan makes this withdrawal without prejudice  
10 to refile for a preliminary injunction and re-setting the preliminary injunction hearing  
11 after the resolution of (1) Swan’s pending motion to compel certain Defendants to return  
12 their Swan-issued laptops (*see* ECF No. 53) and/or (2) Swan’s anticipated, regular  
13 noticed motion for expedited discovery from all Defendants.

14  
15 DATED: October 18, 2024

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

18 By: /s/ Ilissa Samplin  
19 Ilissa Samplin

20 *Attorneys for Plaintiff*